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OFFICE OF THE ATTORNEY GENERAL

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DIVISION OF REGIONAL OFFICES
SYRACUSE REGIONAL OFFICE

April 19, 2022

Hon. Miroslav Lovric
United States Magistrate Judge
15 Henry Street
Binghamton, New York 13901

Re: *Estate of Joseph P. King v. Annucci, et al*
Civil Case No.: 9:20-cv-1413

Dear Judge Lovric:

The discovery deadline for the above-entitled matter is May 19, 2022. To date, the parties have engaged in substantial paper discovery and have completed Plaintiff's deposition. However, the parties are still collaborating to schedule Defendants' depositions and are close to solidifying deposition dates that allow for all parties' availability in May and June. Consequently, the parties respectfully request a 90-day extension for the discovery deadline, expert disclosure deadlines, and dispositive motion deadline.

Respectfully,

____s/_____
Aimee Cowan, Esq.
Assistant Attorney General

cc: Hillary Nappi, Esq., *via CM/ECF*
Frank Schirripa, Esq., *via CM/ECF*
Douglas Scott Wiggins, Esq., *via CM/ECF*